



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278*

April 4, 2025

By ECF

The Honorable Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Keith Taylor*, 24 Cr. 524 (JLR)

Dear Judge Rochon:

The Government respectfully writes to inform the Court that a superseding indictment was returned by the grand jury yesterday and docketed today as S1 24 Cr. 524 (JLR) (the “Superseding Indictment”). The Superseding Indictment contains the same charges as the initial indictment, but expands the time frame of the wire fraud and aggravated identity fraud offenses and provides some additional factual detail in the to wit clause of Count One.

The filing of the Superseding Indictment, which the Government had previously indicated to the defendant was contemplated, will not necessitate the production of any additional discovery. Given that no new charges are included in the Superseding Indictment, and that the Court has already excluded time under the Speedy Trial Act until the start of trial, May 12, 2025, the Government has no objection to the Court deferring an arraignment on the Superseding Indictment until the final pretrial conference.

Respectfully submitted,

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cc: (by ECF)

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